

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ABN AMRO MORTGAGE GROUP, INC.,

Plaintiff,
- against -

Case No. 07-CIV-7657

NATIONAL SETTLEMENT AGENCY, INC.,
STEVEN M. LEFF, RACHEL M. LEFF and
RICHARD A. LEFF,

Defendants.

X

SUPPLEMENTAL AFFIDAVIT OF STEVEN LEFF

Steven M. Leff, being duly sworn, deposes and says:

1. I am a defendant in the above-captioned proceeding.
2. I state that to the best of my knowledge and recollection I currently own or maintain the following bank accounts, investment accounts, investments, commercial paper, real property, motor vehicle, watercraft or other personal property with a value in excess of \$10,000:

(a)

Chase Bank
350 5th Ave
New York, NY 10118
(212) 643-4040

Titled: Steven M. Leff

Account Type: Checking

Acct Number 091361821265

Approximate Balance: -\$2,349,110.15* *(THE DASH DENOTES A
NEGATIVE BALANCE)

Bridgehampton National Bank - Checking
26 Park Place
East Hampton, NY 11937
(631) 537-1000

Titled: Steven M. Leff

Account Type: Checking

Acct Number: 0480105915

Approximate Balance: \$49.00

Note that there may be an inactive companion Savings Account with no balance which account number I do not have and cannot determine but which will be linked to the checking account and is indexed under my social security number 098-60-8516.

(c) a 2007 Chevrolet Suburban with a lien of approximately \$29,000 with Chase Bank; and

(d) a 2007 Suzuki Boulevard (motorcycle) with a lien of approximately \$11,000 with Suzuki Auto Finance.

3. I state that to the best of my knowledge and recollection, the only current assets of the National Settlement Agency (NSA) with a value in excess of \$10,000 are two (2) commercial lease security deposits which are set forth as follows:

(a) Security Deposit in the approximate amount of \$26,000 held by Vitech Inc. 401 Park Avenue South 12th Floor New York, NY 10016. (Landlord for 404 Park Avenue, 5th Floor Space); and

(b) Security Deposit in the approximate amount of \$100,000 held by Sitt Asset Management, One Penn Plaza (Landlord for 180 Madison Avenue, 12th Floor Space).

4. I further state that the only person with personal knowledge of my assets and finances is Marty Murray, CPA, 425 Madison Avenue, Ninth Floor, New York, New York 10017, (212) 644-2100.

5. As to the request by counsel for plaintiff for a sworn affidavit listing every bank account, brokerage account, or other investment account, held by your affiant or NSA (i.e., all accounts in the name of your affiant or NSA, held in trust by or for your affiant or NSA, and any accounts in which your affiant or NSA has had an interest) in the last two (2) years, the following is a list of the requested accounts as to Steven M. Leff or held in trust by or for Steven M. Leff:

a)

Chase Bank
350 5th Ave
New York, NY 10118
(212) 643-4040

Titled: Steven M. Leff

Account Type: Savings

Acct Number: Unknown and cannot be determined since this is a closed account. I am in possession of no documents for this closed account and do not have access to any documents which would give me the ability to state the account number(s). Information for closed accounts may be obtained through a written request by referring to the SS ID # 098-60-8516 the answers to which would not be available prior to the due date of this expedited discovery request.

Approximate Balance: \$0.00 CLOSED ACCOUNT

b)

Doral Bank, FSB
387 Park Avenue South
New York, New York 10016-8810

Titled: RSSR IRREVOCABLE TRUST

Account Type: MONEY MARKET

Acct Number: Unknown and cannot be determined since this is a closed account and has been closed for more than 6 months. I am in possession of no documents for this closed account and do not have access to any documents or information which would give me the ability to state the account number(s). Information for closed accounts may be obtained through a written request by referring to the Tax ID # 30-6022556 the answers to which would not be available prior to the due date of this expedited discovery request.

Approximate Balance: \$0.00 CLOSED ACCOUNT

c)

Commerce Bank
475 Park Avenue South
New York, NY 10016
(212) 634-2920

Titled: RSSR IRREVOCABLE TRUST

Account Type: MONEY MARKET and CHECKING

Acct Number: 7918200432

Approximate Balance: \$0.00 CLOSED ACCOUNT

d)

Commerce Bank
475 Park Avenue South
New York, NY 10016
(212) 634-2920

Titled: The Rachel M. Leff Life Insurance Trust

Account Type: CHECKING

Acct Number: Unknown and cannot be determined since this is a closed account and has been closed for more than 6 months. I am in possession of no documents for this closed account and do not have access to any documents which would give me the ability to state the account number(s). I do not have the Tax ID number for this trust although I have used all efforts and made due diligence to obtain it.

Approximate Balance: \$0.00 Closed Account.

e)

Chase Bank
350 5th Ave
New York, NY 10118
(212) 643-4040

Titled: National Settlement Agency, Inc.

Account Types: Checking and or Money Market Accounts

Acct Numbers: Unknown and cannot be determined since some NSA accounts have been closed for more than 6 months and perhaps less than 2 years ago. I am in possession of no documents for these closed accounts and do not have access to any documents which would give me the ability to state the account numbers. I have requested information from any NSA closed accounts from Chase but they could not locate any through their customer service number nor when I went into the bank itself. Information may be obtained through a written request by referring to the Tax ID # 13-4035372 the answer to which would not be available prior to the due date of this expedited discovery request.

Approximate Balance: \$0.00 CLOSED ACCOUNT

f)

Bridgehampton National Bank - Checking
26 Park Place
East Hampton, NY 11937
(631) 537-1000

Titled: Steven M. Leff and Rachel Leff

Account Type: Checking

Acct Number: Unknown and cannot be determined since this is a closed account and has been closed for more than 6 months. I am in possession of no documents for these closed accounts and do not have access to any documents which would give me the ability to state the account numbers. I have requested information for this closed accounts from the bank but they could not locate any through their customer service number. Information may be obtained through a written request by referring to the SS # 098-60-8516 the answer to which would not be available prior to the due date of this expedited discovery request.

Approximate Balance: \$0.00 CLOSED ACCOUNT

g)

Bridgehampton National Bank - Checking
26 Park Place
East Hampton, NY 11937
(631) 537-1000

Titled: RSSR IRREVOCABLE TRUST

Account Type: Checking and or Money Market

Acct Number: Unknown and cannot be determined since this is a closed account and has been closed for more than 6 months. I am in possession of no documents

for this closed account and do not have access to any documents which would give me the ability to state the account number(s). I have requested information for this closed accounts from the bank but they could not locate any through their customer service number. Information for closed accounts may be obtained through a written request by referring to the Tax ID # 30-6022556 the answers to which would not be available prior to the due date of this expedited discovery request.

Approximate Balance: \$0.00 CLOSED ACCOUNT

h)

Commerce Bank
475 Park Avenue South
New York, NY 10016
(212) 634-2920

Titled: NATIONAL SETTLEMENT AGENCY, INC.

Account Type: CHECKING

Acct Number: Unknown and cannot be determined since this is a closed account and has been closed for more than 6 months. I am in possession of no documents for this closed account and do not have access to any documents which would give me the ability to state the account number(s). I have requested information for this closed accounts from the bank but they could not locate any through their customer service number. Information for closed accounts may be obtained through a written request by referring to the Tax ID # 13-4035372 the answers to which would not be available prior to the due date of this expedited discovery request.

Approximate Balance: \$0.00 CLOSED ACCOUNT

i)

E-Trade - Stock Trading Account
PO BOX 1542
Merrifield, VA 22116
800-387-2331

Titled: THE RSSR IRREVOCABLE TRUST

Account Type: TRADING

Acct Number: 6107-7464

Approximate Balance: \$0.00 CLOSED ACCOUNT

j)

UBS Financial Services, Inc.
200 Park Ave
New York, NY 10166
212-370-8700

Titled: THE RSSR IRREVOCABLE TRUST

Account Type: Simple IRA

Acct Number: GC 20885

Approximate Balance: \$0.00 CLOSED ACCOUNT

k)

Progressive Credit Union
370 7th Avenue 14th fl
New York, NY 10001
(212) 695-8900

Titled: THE RSSR IRREVOCABLE TRUST

Account Type: Money Market

Member ID: 52014

Approximate Balance: \$0.00 CLOSED ACCOUNT

l)

Chase Bank
350 5th Ave
New York, NY 10118
(212) 643-4040

Titled: The Rachel M. Leff Life Insurance Trust

Account Type: Checking

Acct Number: Acct Number: Unknown and cannot be determined since this is a closed account and has been closed for more than 6 months. I am in possession of no documents for this closed account and do not have access to any documents

which would give me the ability to state the account number(s). I do not have the Tax ID number for this trust although I have made all efforts and used due diligence to obtain it.

Approximate Balance: \$0.00 CLOSED ACCOUNT

6. The following is a list of the requested accounts for which NSA has had an interest in the last two (2) years:

(a)

Chase Bank
350 5th Ave
New York, NY 10118
(212) 643-4040

All Accounts Titled: National Settlement Agency, Inc.

All Account Types: Checking

Acct Numbers: 987077263065, 904613917, 987096757765,
91402335265, 740084702

Balances: Not known since Chase Bank has apparently recently closed these account and no further information is available online, but the last known available balances for all of the accounts was approximately - \$2,300,000.00 due to liens from Federal Lawsuits. *(THE DASH BEFORE LISTED DENOTES A NEGATIVE BALANCE). All accounts are indexed under Tax ID # 13-4035372.

(b)

Commerce Bank
475 Park Avenue South
New York, NY 10016
(212) 634-2920

Titled: NATIONAL SETTLEMENT AGENCY, INC.

Account Type: CHECKING

Acct Number: Unknown and cannot be determined since this is a closed account and has been closed for more than 6 months. I am in possession of no documents for this closed account and do not have access to any documents which would give me the ability to state the account number(s).

Information for closed accounts may be obtained through a written request by referring to the Tax ID # 13-4035372 the answers to which are and will not be available prior to the due date of this expedited discovery request.

Approximate Balance: \$0.00 CLOSED ACCOUNT

7. As to the request by counsel for plaintiff for a sworn affidavit listing every stock or other business or investment interest, brokerage account, or other investment account, held by your affiant or NSA (i.e., all interests held directly or indirectly, personally or in trust) in the last two (2) years, other than those interests held via the accounts listed in accordance with the previous two paragraphs numbered and designated 5 and 6 of this affidavit, the following is a list of the requested stock or other business or investment interest held by or for the whole or partial benefit of Steven M. Leff: (all of the entities listed below had an address of 404 Park Avenue South 5th Floor, NY, NY 10016)

National Settlement Agency, Inc.
100% owned by the RSSR Irrevocable Trust

Fast Track Title Agency, LLC
90% owned by the RSSR Irrevocable Trust 10% by Richard Leff

Jand Technologies, Inc.
100% owned by the RSSR Irrevocable Trust

Guardian Bureau, Inc.
100% owned by the RSSR Irrevocable Trust

The RSSR Irrevocable Trust – beneficiaries, Steven Leff, Rachel Leff, Samule Leff (minor) and Ryan Leff (minor).

Global Alumina Stock, through the E-Trade and UBS Financial Services Account listed above prior to those accounts being closed. No Stock is currently owned.

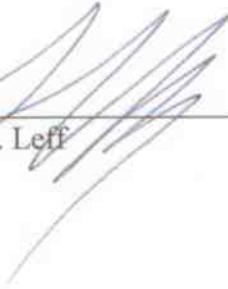
8. The following is a list of the requested stock or other business or investment interest for which NSA has had an interest in the last two (2) years:

None

9. As to the request by counsel for plaintiff for your affiant to provide registration and location information for his car and motorcycle described in the APrior Leff Affidavit®, the following is provided:

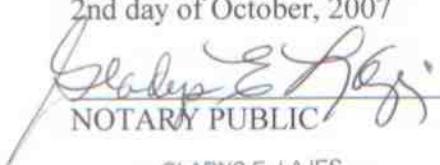
Copies of the registration certificates for the subject vehicles are attached hereto and made a part hereof as Exhibit A. The Chevrolet Suburban is usually parked in the vicinity of 82nd Street and First Avenue in Manhattan, New York. The Suzuki Motorcycle is usually parked at 15 Anvil Court East Hampton, New York.

10. I hereby give to any persons or companies referred to as stated above, the specific authority to release information about the accounts or other assets, companies or holdings to ABN Amro, its attorneys or authorized agents.



Steven M. Leff

Sworn to before me this
2nd day of October, 2007



NOTARY PUBLIC

GLADYS E. LAJES
Notary Public, State of New York
Qualified in New York County
Reg. No. 01LA6010408
My Commission Expires July 20, 2010

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RICHARD A. LEFF,

Defendants.

SUPPLEMENTAL AFFIDAVIT OF STEVEN LEFF

MICHAEL L. SOSHNICK, ESQ.
Attorney for Defendant

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(516) 294-1111